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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN JOSE DIVISION**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 CHRISTIAN REIMER STUKENBROCK,

19 Defendant.

Case No. CR-15-00034 EJD (VKD)

**DEFENSE COUNSEL'S RESPONSE TO  
GOVERNMENT'S MOTION FOR  
FORFEITURE OF BOND AND  
JUDGMENT AGAINST DEFENDANT  
AND FOR ENFORCEMENT OF  
SURETY'S OBLIGATIONS**

**Date: January 7, 2019**

**Time: 1:30 p.m.**

**Judge: Hon. Edward J. Davila**

1 Matthew J. Jacobs was appointed by the Court on January 9, 2018 to represent Christian  
2 Stukenbrock in connection with the Indictment dated January 14, 2015. In connection with that  
3 appointment, Mr. Jacobs and his colleagues Jennifer S. Freel, Erica Connolly, and Adam W. Crider,  
4 from Vinson & Elkins, LLP, (collectively, "Defense Counsel"), were set to begin trial on November  
5 27, 2018. On November 26, 2018, Defense Counsel received an email from the defendant  
6 indicating that he had left the jurisdiction and would not be appearing for trial. Defense Counsel  
7 promptly notified the government and court of this development. Now the government has brought  
8 the instant motion seeking forfeiture of the bond executed by the defendant and his daughter.

9 Defense Counsel has not had any contact with the defendant since receiving the email on  
10 November 26, 2018. Accordingly, Defense Counsel takes no position regarding the government's  
11 motion, and does not intend to appear at the hearing unless ordered to do so by the Court.

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13 Respectfully Submitted,

14  
15 DATED: December 6, 2018

/s/ Matthew J. Jacobs

Matthew J. Jacobs

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17 Attorney for Defendant Christian Reimer  
18 Stukenbrock  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on December 6, 2018, the foregoing document was electronically filed with the Clerk of the Court for the UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, using Court's Electronic Case Filing (ECF) system. The ECF system routinely sends a "Notice of Electronic Filing" to all attorneys of record who have consented to accept this notice as service of this document by electronic means.

Dated: December 6, 2018

By: /s/ Matthew J. Jacobs

Matthew J. Jacobs

Attorney for Defendant

CHRISTIAN REIMER STUKENBROCK